

EXHIBIT F

Jennifer Kennedy

February 11, 2025

Pages 46 to 49

<p style="text-align: right;">Page 46</p> <p>1 THE REPORTER: We are back on the record at 2 10:29. 3 Q. (BY MR. FIFE) Now, Captain Kennedy, before we 4 broke, we were discussing the third full paragraph of -- 5 on page 4 of Exhibit 17, August 2nd, 2023 citation. 6 Could you review the second paragraph, so 7 just the next paragraph up. We're on page 4. 8 A. Yeah, I was just checking the date. 9 Q. Oh, sorry. 10 A. Yes. 11 Q. And -- so "Officers A. Chapa and F. Mata walked 12 to the corner of Smith and McKinney and observed 13 approximately eight people setting up to serve food to 14 the homeless." The report continues. "Officers 15 approached the listed suspect and advised the suspect" 16 of the signs -- "that signs were posted prohibiting a 17 'food service event' and provided them with a copy of 18 the written warnings." 19 Do you see that? 20 A. Yes. 21 Q. Mark this as Exhibit 18. 22 (Exhibit No. 18 was marked.) 23 Q. (BY MR. FIFE) So I'd like to turn to the 24 second page. This is a photo. What is this a photo of? 25 A. This is a perimeter gate around the Julia</p>	<p style="text-align: right;">Page 48</p> <p>1 informs individuals that to conduct a charitable food 2 service activity they must go to 61 Riesner Street, 3 Houston, Texas 77002? 4 A. Yes. 5 Q. And so now if we can turn back to Exhibit 17, 6 back in that same paragraph that we read from, the next 7 sentence says "Officers also advises the suspect that a 8 new proposed location of 61 Riesner is the preferred 9 location and offered to provide assistance with moving 10 if she wanted." 11 Did I read that right? 12 A. Yes, sir. 13 Q. Did you instruct officers to help groups 14 conducting charitable food service events at the Central 15 Library to provide assistance if they wanted to move to 16 Riesner Street? 17 A. Yes. 18 Q. And in this report when it says 61 Riesner 19 Street, that's referring to the same address that we 20 just read on Exhibit 18, the notice? 21 A. Yes. 22 Q. So if you or I say "61 Riesner Street" 23 throughout this rest of this deposition, we understand 24 we're talking about 61 Riesner Street, Houston, Texas 25 77002, correct?</p>
<p style="text-align: right;">Page 47</p> <p>1 Ideson Building at the library, Central Library. 2 Q. And do you see the notice on the left side of 3 the page? 4 A. Yes. 5 Q. Is that a notice regarding the charitable food 6 service ordinance? 7 A. Yes. 8 Q. And is this the sign that the officers would 9 have been referring to in that line of the report we 10 just read? 11 A. Yes. 12 Q. So if you turn back to page 1 which is marked 13 COH 000001, this is the text of the sign. And about 14 halfway down there's a sentence that starts "If you want 15 to conduct charitable" -- do you see that sentence? 16 A. Yes, sir. 17 Q. If says "If you want to conduct charitable food 18 service on city property, you must do so at the nearby 19 downtown location of 61 Riesner Street, Houston, Texas 20 77002." 21 A. Yes. 22 Q. And if we can turn back to the report -- or 23 actually one more question on Exhibit 18, the signs. 24 So this notice that is in front of -- is 25 along the gate in front of the Julia Ideson Building</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Correct. 2 Q. Which is a location near the old police station 3 and the municipal courthouse? 4 A. Yes, sir. 5 Q. And so would -- so if -- in order to accept the 6 officer's assistance with moving, would Food Not Bombs 7 had to have changed anything about their event? 8 MS. ANDERSON: Objection; form. 9 A. I don't believe so. 10 Q. (BY MR. FIFE) So what I mean by change the 11 event is serve different food, serve a different 12 constituency, take off their T-shirts? 13 A. No. 14 Q. Would the officers have provided assistance to 15 the people receiving food, for example, a shuttle to get 16 to 61 Riesner? 17 A. If any of them needed to, yes. If any of them 18 requested assistance in moving over there, we assist 19 them. 20 Q. They would have helped move 100 people? 21 A. Yeah. 22 Q. How would they have done that? 23 A. They would have taken several trips, but I 24 advise the officers out there, if anybody needed 25 assistance moving, we would provide it.</p>

Jennifer Kennedy

February 11, 2025

Pages 50 to 53

<p style="text-align: right;">Page 50</p> <p>1 Q. Okay.</p> <p>2 A. We also have access to the HOT team, as you</p> <p>3 spoke about earlier, the homeless outreach team. They</p> <p>4 have access to Sprinter vans, and those individuals</p> <p>5 could get loaded up in a Sprinter van and driven to</p> <p>6 61 Riesner.</p> <p>7 Q. And just to be clear, if they had moved to</p> <p>8 61 Riesner Street, they could have served the same food</p> <p>9 that they had prepared for that night?</p> <p>10 A. Correct.</p> <p>11 Q. Now, zooming out a little bit, had the -- so</p> <p>12 this was a citation given to Food Not Bombs for</p> <p>13 allegedly conducting a charitable food service event,</p> <p>14 right?</p> <p>15 MS. ANDERSON: Objection; form.</p> <p>16 A. It was a citation issued to James Foster, not</p> <p>17 Food Not Bombs.</p> <p>18 Q. (BY MR. FIFE) Good corrective. So this was a</p> <p>19 citation issued to James Foster for his participation in</p> <p>20 an alleged charitable food service event?</p> <p>21 MS. ANDERSON: Objection; form.</p> <p>22 A. It was a citation issued to James Foster for</p> <p>23 violation of the ordinance.</p> <p>24 Q. (BY MR. FIFE) Okay. Now, if the City had</p> <p>25 given Mr. Foster permission to serve food at the</p>	<p style="text-align: right;">Page 52</p> <p>1 61 Riesner Street, that the officers on-site would have</p> <p>2 provided assistance to individuals receiving food from</p> <p>3 the event?</p> <p>4 A. Yes.</p> <p>5 Q. Now, for groups at 61 Riesner, does the City</p> <p>6 currently provide transportation to help individuals</p> <p>7 seeking food get to 61 Riesner Street?</p> <p>8 MS. ANDERSON: Objection; form?</p> <p>9 MR. FIFE: You can answer.</p> <p>10 A. I don't believe that there is like a organized</p> <p>11 transportation to get to 61 Riesner. I know they have</p> <p>12 access to zTrips, to METROLift, METRO shuttles. So</p> <p>13 those are city operated so I'm not...</p> <p>14 Q. (BY MR. FIFE) And I guess my question is just</p> <p>15 those are city services that you can use regardless of</p> <p>16 your participation in a charitable food service event?</p> <p>17 A. Right.</p> <p>18 Q. Now, last thing on this police report, so on --</p> <p>19 you mentioned that the officers on the DRT team that</p> <p>20 conducted enforcement actions at charitable food service</p> <p>21 events near the library did so after their regular</p> <p>22 shift?</p> <p>23 A. Yes.</p> <p>24 Q. And so you created a schedule of officers</p> <p>25 assigned to conduct enforcement actions for alleged</p>
<p style="text-align: right;">Page 51</p> <p>1 location of the citation, would this alleged conduct</p> <p>2 violate the ordinance?</p> <p>3 MS. ANDERSON: Objection; form.</p> <p>4 Q. (BY MR. FIFE) I can rephrase.</p> <p>5 A. Yes, please.</p> <p>6 Q. So if James Foster or -- yeah, if Mr. Foster</p> <p>7 had advanced written consent from the City of Houston to</p> <p>8 serve -- to conduct a charitable food service event at</p> <p>9 the location of the citation, would that have violated</p> <p>10 the ordinance?</p> <p>11 A. Based on the wording of the ordinance, no.</p> <p>12 Q. And so if we turn back to -- now, could a group</p> <p>13 registered with the registered charitable food service</p> <p>14 program conduct a charitable food service event at the</p> <p>15 location of this citation -- scratch that. Let me</p> <p>16 rephrase.</p> <p>17 At the time of this citation at issue,</p> <p>18 could a registered charitable food service group conduct</p> <p>19 a food service event near the public library without</p> <p>20 advanced written consent of the City of Houston?</p> <p>21 A. No.</p> <p>22 Q. Okay. Now I wanted to turn back just really</p> <p>23 quickly to what we discussed earlier in terms of getting</p> <p>24 to 61 Riesner Street. So you testified that, had Food</p> <p>25 Not Bombs and Mr. Foster been willing to move to</p>	<p style="text-align: right;">Page 53</p> <p>1 violations of the charitable feeding ordinance?</p> <p>2 A. My DRT sergeant created the schedule. I</p> <p>3 advised him to create it.</p> <p>4 Q. Okay. And so were those officers paid overtime</p> <p>5 for being paid at charitable food service events?</p> <p>6 A. They were paid overtime for working, correct.</p> <p>7 Q. Okay. How much would you estimate the officers</p> <p>8 as part of the DRT -- scratch that.</p> <p>9 How much would you estimate it cost the</p> <p>10 City to have those officers conduct enforcement actions</p> <p>11 for alleged violations of the charitable food service</p> <p>12 ordinance?</p> <p>13 MS. ANDERSON: Objection; form.</p> <p>14 MR. FIFE: You can answer.</p> <p>15 A. I would need paper, pen, and a calculator to</p> <p>16 give you some sort of an accurate estimate. But during</p> <p>17 those times when the different response teams were out</p> <p>18 there, they were not only enforcing the charitable</p> <p>19 feeding ordinance. So they were also addressing other</p> <p>20 civility issues such as issues outside The Beacon,</p> <p>21 issues along Main Street, issues behind some of the</p> <p>22 METRO stops along Capital. So it wasn't solely</p> <p>23 dedicated to charitable feeding. They addressed other</p> <p>24 issues as well during that overtime slot.</p> <p>25 Q. (BY MR. FIFE) Well, let me put it this way.</p>

Jennifer Kennedy

February 11, 2025

Pages 78 to 81

<p style="text-align: right;">Page 78</p> <p>1 are listed. But outside of that, I don't know.</p> <p>2 Q. So were you aware of any criteria that the City</p> <p>3 applied to all of these locations from 2012 to 2016?</p> <p>4 A. No.</p> <p>5 Q. Are you aware of any written guidance from 2012</p> <p>6 to 2016 identifying what criteria the City would use to</p> <p>7 approve or disapprove public property for charitable</p> <p>8 food service events?</p> <p>9 A. No.</p> <p>10 Q. Now, we were -- so the category we were just</p> <p>11 discussing was City-owned property locations approved</p> <p>12 from 2012 to 2016, right?</p> <p>13 A. Yes.</p> <p>14 Q. Now, the next list or -- sorry. The next</p> <p>15 category in these responses was food and housing</p> <p>16 programs from 2019 to 2022, right?</p> <p>17 A. Yes.</p> <p>18 Q. So what were -- were any public property</p> <p>19 locations approved for charitable food service events</p> <p>20 from 2016 to 2019?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you see any listed in the City's</p> <p>23 interrogatory responses?</p> <p>24 A. No.</p> <p>25 Q. Could you name a location that was approved</p>	<p style="text-align: right;">Page 80</p> <p>1 listed as approved from 2016 to '19; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. I'm going to mark this next document as</p> <p>4 Exhibit 22.</p> <p>5 (Exhibit No. 22 was marked.)</p> <p>6 Q. (BY MR. FIFE) It is a short e-mail thread</p> <p>7 between Ms. Rubi Longoria and Mr. Joe Turner. And,</p> <p>8 Captain Kennedy, do you see that there are two e-mails</p> <p>9 in the middle of the document in the original message?</p> <p>10 There's that line that says original message is an</p> <p>11 e-mail from Ms. Rubi Longoria to Joe Turner on July 8th,</p> <p>12 2016.</p> <p>13 Do you see that, that first e-mail?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know who Rubi Longoria is?</p> <p>16 A. I do not.</p> <p>17 Q. And so you don't know what role she is or what</p> <p>18 role she had in 2016 with the City?</p> <p>19 A. Based on her e-mail address, she worked for</p> <p>20 parks and rec department. But as far as her exact role,</p> <p>21 I don't know.</p> <p>22 Q. And you're saying the PRD stands for parks and</p> <p>23 rec department?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Same question for Joe Turner -- do you</p>
<p style="text-align: right;">Page 79</p> <p>1 for charitable food service events -- a public property</p> <p>2 location that was approved for charitable food service</p> <p>3 events from 2016 to '19?</p> <p>4 A. No.</p> <p>5 Q. And I just want to confirm you also said you</p> <p>6 were unaware of -- let me put the question this way.</p> <p>7 Were any locations approved from 2016 to</p> <p>8 '19 for charitable food service events?</p> <p>9 A. Not that I know of.</p> <p>10 Q. Do you know if the City made a decision to not</p> <p>11 approve any locations from 2016 to '19?</p> <p>12 A. No, I don't know that. I don't believe there</p> <p>13 was any enforcement between 2016 to 2019 of the</p> <p>14 ordinance.</p> <p>15 MR. FIFE: Could we take a five-minute</p> <p>16 break?</p> <p>17 THE REPORTER: Off the record at 11:28.</p> <p>18 (Recess from 11:28 a.m. to 12:30 p.m.)</p> <p>19 THE REPORTER: Back on the record at 12:30.</p> <p>20 Q. (BY MR. FIFE) So, Captain Kennedy, before we</p> <p>21 left for lunch, we were discussing what locations, if</p> <p>22 any, the City had approved for charitable food service</p> <p>23 events from 2015 to '19. And that's page 4 of this</p> <p>24 City's answers and objections to our interrogatories.</p> <p>25 We agreed before the break that there were no locations</p>	<p style="text-align: right;">Page 81</p> <p>1 know what his role was at the time of this e-mail?</p> <p>2 A. No.</p> <p>3 Q. But safe to say he was an employee of the parks</p> <p>4 and rec department?</p> <p>5 A. Yes.</p> <p>6 Q. Based on the PRD next to his e-mail?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. Now, looking at the message,</p> <p>9 Ms. Longoria writes "I understand that all charitable</p> <p>10 feedings have been canceled until further notice."</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. Okay. Do you know or does the City know</p> <p>14 whether Ms. Longoria was correct that as of July 8th,</p> <p>15 2016, all charitable feedings had been canceled until</p> <p>16 further notice?</p> <p>17 A. I do know that the feedings that were taking</p> <p>18 place at the parks in 2016 -- I don't know the exact</p> <p>19 date. I do know those feedings at the park were</p> <p>20 canceled. There was serious safety concerns. There was</p> <p>21 a huge increase in the kush among the homeless</p> <p>22 population that was creating a lot of issues for the</p> <p>23 parks. And I believe the City felt like it was no</p> <p>24 longer safe to host these -- or to allow these events to</p> <p>25 be hosted on the park property. And so they were</p>

Jennifer Kennedy

February 11, 2025

Pages 82 to 85

<p style="text-align: right;">Page 82</p> <p>1 canceled.</p> <p>2 Q. So -- so in 2016, the parks and recreation</p> <p>3 department decided to suspend all charitable feeding</p> <p>4 activities on parks' property due to the kush and issues</p> <p>5 that kush was causing in the parks?</p> <p>6 A. I don't know if it was parks and recs</p> <p>7 department that decided that, but the City decided that.</p> <p>8 Q. Okay.</p> <p>9 A. Yes.</p> <p>10 Q. And so -- and you can just see here for</p> <p>11 completeness, Mr. Joe Turner echoes what you had said</p> <p>12 that -- and he writes "They have all been temporary</p> <p>13 suspended while the mayor works through the kush issue</p> <p>14 first in our parks and public areas. And then second,</p> <p>15 we be working to set up discussions with the faith-based</p> <p>16 organizations on how to best provide services to those</p> <p>17 in need, not just feedings."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. So you discussed the first part in your answer</p> <p>21 which was issues related to kush. But at the time, was</p> <p>22 the City also trying to work with faith-based</p> <p>23 organizations on how to best provide services to those</p> <p>24 in need?</p> <p>25 A. I believe so. And right around this time also</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. So at the time of this e-mail, the -- the City</p> <p>2 had suspended charitable food activities on public</p> <p>3 parks, but at the time there was not a plan to</p> <p>4 reauthorize those charitable food service activities?</p> <p>5 A. I believe so.</p> <p>6 Q. Now, what is kush?</p> <p>7 A. It's synthetic marijuana.</p> <p>8 Q. At the time, was it illegal?</p> <p>9 A. Yes. So there was -- I don't know -- have the</p> <p>10 exact dates as far as legislation. The issue with kush</p> <p>11 and synthetic marijuana is there are several different</p> <p>12 chemical formulations, right? And so their court system</p> <p>13 was having a difficult time keeping up with the</p> <p>14 different chemical formulations and having legislation</p> <p>15 to list all chemical formulations as controlled</p> <p>16 substances that is illegal.</p> <p>17 Q. And was legislation prohibiting these various</p> <p>18 chemical iterations eventually passed?</p> <p>19 A. Yes. Now, there are -- this is somewhat out of</p> <p>20 my scope as I'm not a narcotics officer or, you know, a</p> <p>21 scientist. However, synthetic marijuana -- I mean, it</p> <p>22 is illegal, but there are different -- I mean you can</p> <p>23 come up with different formulations that would then need</p> <p>24 to be introduced into legislation.</p> <p>25 Q. So is kush just -- and again, I appreciate that</p>
<p style="text-align: right;">Page 83</p> <p>1 in 2016 is when Rapid Rehousing Program began. And so</p> <p>2 it was likely an effort to collaborate with the</p> <p>3 organizations that were conducting the feedings to offer</p> <p>4 those, like, housing services along with the feedings.</p> <p>5 Q. Uh-huh. And was that desire to work with</p> <p>6 faith-based organizations on how to collaboratively</p> <p>7 implement the Rapid Rehousing Program, was that also a</p> <p>8 basis for suspending charitable food activities in the</p> <p>9 parks?</p> <p>10 A. No. I believe that the primary basis was just</p> <p>11 safety concerns.</p> <p>12 Q. Safety concerns related to kush?</p> <p>13 A. Right.</p> <p>14 Q. Okay. So at the time of this e-mail, all</p> <p>15 charitable food service activities in public parks had</p> <p>16 been suspended, right?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. Was there a plan or criteria in place at which</p> <p>19 point the city parks could be reauthorized as locations</p> <p>20 for charitable food service activities?</p> <p>21 A. Not when it was canceled. I don't think they</p> <p>22 had a plan in place to reopen. When it was canceled, it</p> <p>23 was canceled for safety issues. Then I'm assuming as it</p> <p>24 says here the mayor was going to work with the</p> <p>25 organizations to kind of move forward.</p>	<p style="text-align: right;">Page 85</p> <p>1 you're not a narcotics officer, but just is kush one</p> <p>2 type of synthetic marijuana among other types of</p> <p>3 marijuana or is kush an umbrella term for all synthetic</p> <p>4 marijuana?</p> <p>5 A. It's an umbrella term.</p> <p>6 Q. Okay.</p> <p>7 A. So kush is an umbrella term. So there's</p> <p>8 marijuana, right, just your standard marijuana with THC.</p> <p>9 And then there is synthetic marijuana that has all of</p> <p>10 these other different substances in it that are supposed</p> <p>11 to emulate the effects of actual marijuana. But in</p> <p>12 reality, they had significantly different effects on a</p> <p>13 lot of people. I personally have had probably well over</p> <p>14 100 interactions with individuals that are high on kush.</p> <p>15 And it is -- it is a scary situation.</p> <p>16 Q. So in 2016, in -- as of July 8th, 2016, the</p> <p>17 time of this e-mail, were other drugs besides kush a</p> <p>18 problem in the City of Houston?</p> <p>19 A. Yes.</p> <p>20 Q. So the reason I ask that is just to set up the</p> <p>21 next question which is what made kush unique?</p> <p>22 A. So kush was almost like when PCP became popular</p> <p>23 in that a lot of people began using it without</p> <p>24 understanding the effects. And it caused major behavior</p> <p>25 changes in individuals, a lot of violent outbursts.</p>

Jennifer Kennedy

February 11, 2025

Pages 126 to 129

<p style="text-align: right;">Page 126</p> <p>1 Central Houston Public Library Plaza, 500 McKinney, 2 Houston, 77002, as an approved charitable food service 3 location for Food Not Bombs." 4 Do you see that? 5 A. Yes. 6 Q. So as of September 5th, 2012, was the Central 7 Houston Public Library an approved charitable food 8 service event location for Food Not Bombs? 9 A. According to this newsletter. 10 Q. Well, I guess just as a first question, did 11 Mayor Parker have authority to give Food Not Bombs 12 permission to serve food at the Central Library? 13 A. That would be as a mayor within her scope of 14 authority. 15 Q. Okay. But we discussed last time that the 16 ordinance says the parks and health department directors 17 can also approve locations, rules, criteria to 18 administer charitable food service events, right? 19 MR. SOH: Objection; form. 20 Go ahead and answer if you can. 21 A. Yes. In the ordinance? 22 Q. (BY MR. FIFE) Yes. 23 A. Yes. 24 Q. So in addition to those departments, the mayor 25 can also give permission? As Mayor Parker did in 2012?</p>	<p style="text-align: right;">Page 128</p> <p>1 A. No, not specifically. I know -- it's not that 2 their permission was revoked. It's the only approved 3 location was going to be 61 Riesner. So there was never 4 a -- here your permission is hereby revoked. It's as of 5 this date, this is going to be the only approved 6 location. 7 Q. And the only approved location was 61 Riesner 8 Street, right? 9 A. Correct. 10 Q. So was there a reason why the Central Library 11 was no longer going to be allowed -- let me put that 12 differently. 13 Why was the Central Library no longer going 14 to be authorized as a charitable food service event 15 location? 16 A. There were significant issues and safety 17 concerns coming from the Central Library. And the City 18 also found that a coordination of efforts among those 19 that participate in the food service events would be 20 mutually beneficial to not only those who provide the 21 food but those who receive the food as well as the 22 property where the feeding occurs. 23 Q. So if Food Not Bombs at the time wanted to use 24 another location for its charitable food service events, 25 were there any criteria by which they could select a</p>
<p style="text-align: right;">Page 127</p> <p>1 A. I'm assuming that was in coordination with the 2 health department. 3 Q. And have you ever seen this response -- or had 4 you ever seen this statement that Mayor Parker gave Food 5 Not Bombs Houston permission to use the Central Library? 6 A. No. 7 Q. And you said earlier that currently Food Not 8 Bombs does not have authorization from the city to 9 conduct charitable food service events at the Central 10 Library? 11 A. Correct. 12 Q. So when was the permission revoked? 13 A. Well, I would say that it was in February of 14 2023 when they received warning that they were no longer 15 going to be able to feed there and that they have to 16 feed at 61 Riesner, so before any sort of enforcement 17 action took place. 18 Q. Okay. Do you know -- based on what you said, I 19 think I know this answer. But are you aware when this 20 newsletter was taken down off of the City of Houston web 21 page? 22 A. No. 23 Q. And then in February of 2023 when Food Not 24 Bombs permission was revoked, do you know who made that 25 decision?</p>	<p style="text-align: right;">Page 129</p> <p>1 different public property location? 2 A. No. 3 Q. It was just 61 Riesner Street, right? 4 A. Correct. 5 Q. And before you mentioned that, in February of 6 2023, the health department issued guidelines outlining 7 sufficient trash reciprocals, handwashing stations, and 8 24/7 porta potty access as requirements for any public 9 property where charitable feeding would occur? 10 A. Well, it's -- yes. So it's access during a 11 food service event and available 24/7. That does not 12 mean that bathrooms have to be unlocked 24/7. It means 13 that they have to be available for use 24/7. And then, 14 basically open during a food service event. If you read 15 the ordinance, it's clear in there. But yes. So right. 16 Q. Okay. So to -- so it's handwashing stations, 17 sufficient trash reciprocals, and porta potties for use 18 during food service? 19 A. And parking. 20 Q. And parking? 21 A. Yes. 22 Q. Now, if Food Not Bombs had identified another 23 location, another publicly owned location that met those 24 four criteria, could they have used it for a charitable 25 food service event?</p>

Jennifer Kennedy

February 11, 2025

Pages 130 to 133

<p style="text-align: right;">Page 130</p> <p>1 A. If they received permission from the public or 2 private owner. But if it was a public property, then 3 that would be something that had to be approved, you 4 know, by the City. So if it was a private place then, 5 yes, absolutely. 6 Q. But in terms public property, a location with 7 those four criteria we discussed would not necessarily 8 be approved for the charitable food service event. They 9 would still need to ask the City for permission? 10 A. Correct. 11 Q. If a location had those four elements that we 12 discussed -- the porta potty, handwashing, parking, and 13 trash reciprocals -- would the City approve that 14 location, or would they still just say 61 Riesner 15 Street? 16 MR. SOH: Objection; form. 17 MR. FIFE: You can answer. 18 A. I think that could be a possibility. But it 19 would also have to be, you know, something where the 20 City looks at the safety in providing, having, you know, 21 resources as far as being able to provide officers for 22 security so. 23 Q. (BY MR. FIFE) Now, so previously we discussed 24 61 Riesner Street as an approved -- or actually we were 25 just discussing 61 Riesner Street as an approved public</p>	<p style="text-align: right;">Page 132</p> <p>1 A. There were several reasons -- its close 2 proximity to the library where people were already being 3 fed. It's a half a mile walk. It's well lit. The 4 sidewalks are actually brand new from McKinney and all 5 along Bagby until you get to Capital. There's no 6 mobility issues with any of the sidewalks, no safety 7 concerns. 8 There's one intersection that would have to 9 be crossed as a protected intersection that's frequented 10 all the time especially by individuals going to the 11 Hobby Center. It's in very close proximity to the Bayou 12 Place which is a location where we know that many of the 13 individuals that are participating in the feeding. 14 That's where they sleep at night as well, close to the 15 Beacon which is another major homeless provider 16 downtown. 17 We also had the ability there to provide 18 not only the minimum of ten parking spots, trash can 19 receptacles, porta potties, and handwashing stations, 20 but we have electrical outlets available for people. We 21 have portable lighting that was available. And we have 22 police nearby. And then also police that would be 23 on-site. So it's a safe location. 24 Q. Who was involved in that decision? 25 A. I remember having a conversation with Chief</p>
<p style="text-align: right;">Page 131</p> <p>1 property for charitable feeding events. That was 2 approved in 2022? 3 A. 2023, I believe. 4 Q. Okay. So February of 2023 is when the City 5 started issuing notices that -- 6 A. Yes. 7 Q. Sorry. They started issuing notices in 2023, 8 right? 9 A. Correct. 10 Q. And the notices said that all charitable food 11 service events had to take place at 61 Riesner Street? 12 A. Yes. Excuse me. If it was on public property. 13 Q. Yes, yes. So in February of 2023, the only 14 approved property for charitable food service events was 15 61 Riesner Street, right? 16 A. Yes. 17 Q. And that means there were no parks approved, 18 right? 19 A. Correct. 20 Q. And no other public sidewalks or public streets 21 were available as charitable food service locations? 22 MR. SOH: Objection; form. 23 A. Yes. 24 Q. (BY MR. FIFE) Why did the City choose 25 61 Riesner Street?</p>	<p style="text-align: right;">Page 133</p> <p>1 Satterwhite about considering 61 Riesner as a location. 2 I believe he was involved, heavily involved, in that 3 decision. He asked my opinion at one point. That's why 4 we spoke about it. I thought that was a great location. 5 I'm not sure who made the final decision as for it being 6 61 Riesner. 7 Q. Did Chief Satterwhite speak with the mayor 8 about 61 Riesner Street? 9 A. I believe so. 10 Q. Okay. And you mentioned the quality of the 11 sidewalks, how close it is to the Central Library, 12 lighting, proximity to locations where homeless 13 individuals spend a lot of time, and safety of 14 61 Riesner Street. Were those -- who came up with those 15 criteria or factors? 16 A. Those weren't criteria or factors. They were 17 just benefits of that location. 18 Q. So were there any written criteria or factors 19 that the City had to consider? 20 A. No. Nothing outside of what the health 21 department had already created -- basically the parking 22 restrictions, you know, minimum of ten parking spaces, 23 sufficient trash reciprocals, portable restrooms, and 24 handwashing stations available during a food service 25 event and available 24/7.</p>

Jennifer Kennedy

February 11, 2025

Pages 134 to 137

<p style="text-align: right;">Page 134</p> <p>1 Q. And so I understand the benefits of -- the</p> <p>2 benefits of -- that you've described for 61 Riesner</p> <p>3 Street, but I want to know why the City decided to have</p> <p>4 only one approved location as opposed to having multiple</p> <p>5 properties, public properties that could be used for</p> <p>6 charitable food service events.</p> <p>7 A. Well, as of now, there was a huge group of</p> <p>8 individuals that were receiving food downtown. So we</p> <p>9 knew that it needed to be local to downtown for the</p> <p>10 groups that were receiving food could easily get to,</p> <p>11 right?</p> <p>12 And as far as ensuring officers for safety</p> <p>13 and allocating resources, I think it was the initial</p> <p>14 ideas. Let's start with this one location because we</p> <p>15 already know it's going to be successful in feeding the</p> <p>16 same amount of people that were already being fed at the</p> <p>17 library.</p> <p>18 Q. Has this, since 61 Riesner became the sole</p> <p>19 location in 2023, has the City created or authorized</p> <p>20 charitable food service events at more public</p> <p>21 properties?</p> <p>22 A. No.</p> <p>23 Q. And so I'm not sure what you just said answered</p> <p>24 my original question which is why did the City decide to</p> <p>25 create one location as the exclusive place for</p>	<p style="text-align: right;">Page 136</p> <p>1 A. I'm not sure.</p> <p>2 Q. Yeah. So can you turn to the back page which</p> <p>3 is COH-084927. In the middle of the page, there's an</p> <p>4 e-mail that's from Andy Icken to Mayor Turner,</p> <p>5 Marvalette Hunter, Marc Eichenbaum, and James Koski.</p> <p>6 Do you see that?</p> <p>7 A. I do.</p> <p>8 Q. And this e-mail was sent on August 11th, 2021.</p> <p>9 It says "Mayor, after our call this afternoon, James"</p> <p>10 and I -- "James, Marc, and I got together to be sure we</p> <p>11 focus on possible feeding sites that met the criteria we</p> <p>12 discussed."</p> <p>13 Do you know what criteria they discussed?</p> <p>14 A. I do not.</p> <p>15 Q. Is the criteria they discussed written</p> <p>16 anywhere?</p> <p>17 A. I do not know.</p> <p>18 Q. But sitting here today, you don't know what</p> <p>19 criteria Mr. Icken was referring to?</p> <p>20 A. No.</p> <p>21 Q. And then he continues "We plan on focusing on</p> <p>22 three different sites that potentially meet the needs:</p> <p>23 1. St. John's/ Pastor Rudy."</p> <p>24 Who is Pastor Rudy?</p> <p>25 A. I do not know him.</p>
<p style="text-align: right;">Page 135</p> <p>1 charitable food service events instead of how it had in</p> <p>2 2012 through 2016 approved multiple locations throughout</p> <p>3 Houston?</p> <p>4 A. Well, the City does not have the resources to</p> <p>5 staff every single park to conduct charitable food</p> <p>6 events in a safe manner.</p> <p>7 Q. What other locations did the City consider --</p> <p>8 or let me put that differently.</p> <p>9 So in authorizing and creating an exclusive</p> <p>10 location for charitable food service events on city</p> <p>11 property, were there other locations that the city</p> <p>12 considered besides 61 Riesner Street?</p> <p>13 A. I'm not sure.</p> <p>14 Q. I will mark this as Exhibit 27.</p> <p>15 (Exhibit No. 27 was marked.)</p> <p>16 MR. SOH: So I assume we're done with 26.</p> <p>17 MR. FIFE: Yes.</p> <p>18 Q. (BY MR. FIFE) This is an e-mail thread</p> <p>19 between -- well, several members of the mayor's staff.</p> <p>20 And do you know what HCD means?</p> <p>21 A. Where is that at?</p> <p>22 Q. It's next to Mr. Marc Eichenbaum's e-mail.</p> <p>23 A. I know he was assigned to the homeless</p> <p>24 initiatives, so maybe.</p> <p>25 Q. It's okay.</p>	<p style="text-align: right;">Page 137</p> <p>1 Q. Does he run or direct the Bread of Life</p> <p>2 organization?</p> <p>3 A. That sounds familiar. Quite possibly, but I do</p> <p>4 not know for sure.</p> <p>5 Q. Where is St. John/Pastor Rudy's facilities?</p> <p>6 A. Based on this e-mail, I would say the southeast</p> <p>7 quadrant of central business district just south of the</p> <p>8 Pierce Elevated.</p> <p>9 Q. So the next is municipal courthouse area. And</p> <p>10 then there is a -- and then -- so the municipal</p> <p>11 courthouse area is -- would include 61 Riesner Street?</p> <p>12 A. Yes -- sorry.</p> <p>13 Q. 61 Riesner Street is in the municipal</p> <p>14 courthouse area?</p> <p>15 A. Yes.</p> <p>16 Q. And if you can look at the last sentence, it</p> <p>17 says "The challenge will be the perception it is 'out of</p> <p>18 sight.'"</p> <p>19 Did I read that correctly?</p> <p>20 A. Yes.</p> <p>21 Q. So can you turn back to the first page? This</p> <p>22 is -- and then at the bottom of the first page, there is</p> <p>23 an e-mail from Marvalette Hunter.</p> <p>24 Do you see that, that she sent on</p> <p>25 October 12, 2021?</p>

Jennifer Kennedy

February 11, 2025

Pages 138 to 141

<p style="text-align: right;">Page 138</p> <p>1 A. I do.</p> <p>2 Q. Ms. Hunter writes "My recommendation is the</p> <p>3 Municipal Courthouse Area No. 2. It has already been</p> <p>4 assessed and is functionally appropriate. Being out of</p> <p>5 sight should not be a determinate of an appropriate</p> <p>6 location."</p> <p>7 Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Does the City agree that in approving</p> <p>10 charitable food service events it does not take into</p> <p>11 account whether a location is "out of sight"?</p> <p>12 MR. SOH: Objection; form.</p> <p>13 Go ahead and answer if you can.</p> <p>14 MR. FIFE: Yeah, let me restart that</p> <p>15 actually.</p> <p>16 Q. (BY MR. FIFE) Here, Ms. Marvalette says that a</p> <p>17 location "being out of sight should not be a determinate</p> <p>18 of an appropriate location" in reference to charitable</p> <p>19 food service events, right?</p> <p>20 Right?</p> <p>21 A. Yes.</p> <p>22 Q. And here, being out of sight, would mean away</p> <p>23 from public view?</p> <p>24 MR. SOH: Objection; form.</p> <p>25 Q. (BY MR. FIFE) What does being out of sight</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. Yeah, whether a lot of people will see it or</p> <p>2 not --</p> <p>3 A. Correct.</p> <p>4 Q. -- does not matter to whether the City will</p> <p>5 approve the location?</p> <p>6 A. Right. Because I don't think that affects the</p> <p>7 ability of an organization to provide food if other</p> <p>8 people can see it or not or the number of people who can</p> <p>9 see it.</p> <p>10 Q. So we've discussed previously that the City</p> <p>11 began posting notices about 61 Riesner in February</p> <p>12 of 2023?</p> <p>13 A. Yes.</p> <p>14 Q. How -- and you said earlier that you talked</p> <p>15 Sergeant Simon about the posting of the signs?</p> <p>16 A. Yes.</p> <p>17 Q. What did you ask him?</p> <p>18 A. I asked him if he knew who posted them. He</p> <p>19 didn't know. I have an e-mail -- I saw an e-mail at one</p> <p>20 point from Andy Icken saying that the signs would be</p> <p>21 posted February 20th. I'm assuming it's just the City's</p> <p>22 general service department that posted them because they</p> <p>23 are the ones that are responsible for that type of</p> <p>24 activity. I was just curious if he knew, you know, who</p> <p>25 posted them.</p>
<p style="text-align: right;">Page 139</p> <p>1 mean to you?</p> <p>2 A. Well, I'm not sure because I work in this</p> <p>3 complex and it's not out of sight. So I'm not exactly</p> <p>4 sure what they're referring to. I mean, you've got the</p> <p>5 courthouse next door that's open until 10:00 p.m.</p> <p>6 You've got I-45 that runs right next to it. And if</p> <p>7 you're on it anytime between 3:00 and 6:00 p.m., you're</p> <p>8 going 20 miles an hour and you can look over into the</p> <p>9 parking lot and see the feeding occurring.</p> <p>10 MR. SOH: I would object that 20 miles an</p> <p>11 hour is a gross exaggeration of the speed limit of the</p> <p>12 Pierce Elevated at 4:00 o'clock in the afternoon.</p> <p>13 A. I'm just not sure what they're getting at as</p> <p>14 far as it being out of sight.</p> <p>15 Q. (BY MR. FIFE) Okay. Yeah, so I think the core</p> <p>16 of what I'm trying to get at is just in deciding whether</p> <p>17 to approve a location for charitable food service</p> <p>18 activities. Does the City consider whether it is -- it</p> <p>19 will be viewed by the public?</p> <p>20 A. Apparently not. I don't think it's something</p> <p>21 where it's -- either way where location is determined</p> <p>22 because it is -- you know, there is people that are</p> <p>23 going to see it versus a location where a lot of people</p> <p>24 will see it. So I think either way that is not used as</p> <p>25 a determinate to identify a location.</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. And so you still don't know because</p> <p>2 Sergeant Simon didn't know either?</p> <p>3 A. Right.</p> <p>4 Q. But whoever did post the signs, they were doing</p> <p>5 so at the direction of city officials who decided that</p> <p>6 61 Riesner Street would be the new location for</p> <p>7 charitable feeding and we need to warn the folks serving</p> <p>8 food at the library?</p> <p>9 A. Yes.</p> <p>10 Q. So in -- from -- so the e-mail that we just</p> <p>11 reviewed from Mr. -- how did you say his name?</p> <p>12 A. Icken.</p> <p>13 Q. Icken -- was in August of 2021. And then the</p> <p>14 signs were posted in February of 2023?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Were individuals conducting charitable food</p> <p>17 service events at 61 Riesner between August 2021 to</p> <p>18 February of '23?</p> <p>19 A. Yes.</p> <p>20 Q. Do you know what groups were doing so?</p> <p>21 A. There were several different groups. Some of</p> <p>22 them were just individuals. Some were churches,</p> <p>23 religious organization. I believe Faizi's and Hussain's</p> <p>24 Table were out there. But there's several different</p> <p>25 organizations.</p>

Jennifer Kennedy

February 11, 2025
Pages 142 to 145

<p style="text-align: right;">Page 142</p> <p>1 Q. But then February of 2023 is when the City made</p> <p>2 a concerted effort to move all Central Library feedings</p> <p>3 to 61 Riesner?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. Well, March 1st.</p> <p>7 Q. March 1st was when the citations began?</p> <p>8 A. March 1st is when the enforcement began.</p> <p>9 Q. Yeah. That was when the first citation was</p> <p>10 issued?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 MR. FIFE: Should we break for ten minutes?</p> <p>14 MR. SOH: Sure.</p> <p>15 (Recess from 2:22 p.m. to 2:35 p.m.)</p> <p>16 THE REPORTER: Back on the record at 2:35.</p> <p>17 Q. (BY MR. FIFE) So we were just discussing</p> <p>18 61 Riesner Street, and I'm going to mark this as</p> <p>19 Exhibit 28.</p> <p>20 (Exhibit No. 28 was marked.)</p> <p>21 Q. (BY MR. FIFE) This is a -- appears to be a</p> <p>22 Google Maps image produced to us during discovery and</p> <p>23 is -- has Bates stamp COH_067224. Now, would you say</p> <p>24 that this is a fair and accurate depiction of the</p> <p>25 municipal court area?</p>	<p style="text-align: right;">Page 144</p> <p>1 anymore. It is -- it used to be the Central Patrol</p> <p>2 Division building. I believe after it got flooded from</p> <p>3 Harvey, we -- is when we discontinued using it. There</p> <p>4 is a general services department group that uses part of</p> <p>5 that building. But I think it's more on the north end</p> <p>6 that is utilized.</p> <p>7 Q. Outside -- and general services, is that</p> <p>8 general services for HPD or --</p> <p>9 A. City of Houston.</p> <p>10 Q. City of Houston? Okay.</p> <p>11 A. Yes.</p> <p>12 Q. Are there any other city functions or</p> <p>13 departments that operate out of 61 Riesner Street?</p> <p>14 A. I don't believe so.</p> <p>15 Q. It was the old Central Patrol Division</p> <p>16 building?</p> <p>17 A. Yes.</p> <p>18 Q. And then to the left of that building, there's</p> <p>19 a municipal courthouse?</p> <p>20 A. Yes.</p> <p>21 Q. And that is the municipal courthouse where Food</p> <p>22 Not Bombs volunteers would go to take care of their</p> <p>23 tickets or contest there citations for violating the</p> <p>24 charitable food service ordinance?</p> <p>25 A. If that's where their court was. There's</p>
<p style="text-align: right;">Page 143</p> <p>1 A. Minus several trees that have since died.</p> <p>2 Q. Okay. So currently there are fewer trees?</p> <p>3 A. Currently there are fewer trees, but everything</p> <p>4 else looks accurate.</p> <p>5 Q. Okay. And it's a little hard to read. But do</p> <p>6 you see in red on the lower right-hand -- or lower right</p> <p>7 side of the page it says "Homeless feeding area" in red</p> <p>8 font?</p> <p>9 A. Yes.</p> <p>10 Q. And it appears to -- the homeless feeding area</p> <p>11 prepares -- appears to begin at the intersection of</p> <p>12 Lubbock Street and Artesian Place?</p> <p>13 A. So the feeding actually takes place in this</p> <p>14 small parking lot that is really sandwiched between</p> <p>15 Lubbock, Riesner, and Artesian.</p> <p>16 Q. Could you mark that on your map with a star?</p> <p>17 So that's slightly to the left of the red font, homeless</p> <p>18 feeding area?</p> <p>19 A. Correct.</p> <p>20 Q. What is that building adjacent to Lubbock</p> <p>21 Street directly in front of the homeless feeding area?</p> <p>22 A. 61 Riesner.</p> <p>23 Q. And that building is a Houston Police</p> <p>24 Department building, right?</p> <p>25 A. It is not occupied by the police department</p>	<p style="text-align: right;">Page 145</p> <p>1 several different municipal courts across the city.</p> <p>2 This is the central courthouse; so I'm not sure where</p> <p>3 their docket was.</p> <p>4 Q. Yeah. And on Exhibit 28 itself at the top, it</p> <p>5 says 60- -- the 61 Riesner Street in (HPD headquarters).</p> <p>6 It sounds like you would disagree with that</p> <p>7 characterization?</p> <p>8 A. Yes. HPD headquarters is 1200 Travis.</p> <p>9 Q. Okay. And was it ever HPD headquarters?</p> <p>10 A. Not since I've been on the department for the</p> <p>11 past 17 years. Now, before that, I'm not sure.</p> <p>12 Q. Okay. Prior to the City designating 61 Riesner</p> <p>13 Street as an authorized location for charitable food</p> <p>14 service events, so before it was approved for charitable</p> <p>15 feedings, did 61 Riesner Street have porta potties?</p> <p>16 A. No.</p> <p>17 Q. Did it have free parking?</p> <p>18 A. No.</p> <p>19 Q. Did it have a shipping container for storage?</p> <p>20 A. Not for this use but --</p> <p>21 Q. Not for charitable food service events?</p> <p>22 A. It did not.</p> <p>23 Q. Did it have tables designed for individuals to</p> <p>24 eat food off of?</p> <p>25 A. No.</p>

Jennifer Kennedy

February 11, 2025
Pages 174 to 177

<p style="text-align: right;">Page 174</p> <p>1 A. I'm unsure if there is proof or not so.</p> <p>2 Q. Now, isn't it true that, if a person was not at</p> <p>3 a Food Not Bombs feeding event such as the people who</p> <p>4 were there, isn't it true they could be elsewhere in the</p> <p>5 city and possibly litter?</p> <p>6 MR. SOH: Objection; form.</p> <p>7 A. That was very confusing. Do you mind</p> <p>8 rephrasing that question?</p> <p>9 MR. KALLINEN: It's so obvious. That's why</p> <p>10 it's confusing.</p> <p>11 Q. (BY MR. KALLINEN) If a person is not at Food</p> <p>12 Not Bombs getting fed by the Food Not Bombs people,</p> <p>13 isn't it true they could be on another part of the city</p> <p>14 and then commit litter?</p> <p>15 A. That is --</p> <p>16 MR. SOH: Objection; form.</p> <p>17 A. I don't...</p> <p>18 Q. (BY MR. KALLINEN) You don't know if a person</p> <p>19 can litter in another part of the city? That's how</p> <p>20 obvious this question is. It seems so obvious that</p> <p>21 maybe you don't feel like you want to answer it.</p> <p>22 Can somebody else litter in another part of</p> <p>23 the city other than by the library?</p> <p>24 MR. SOH: Objection to the predicate.</p> <p>25 Go ahead and answer, Captain.</p>	<p style="text-align: right;">Page 176</p> <p>1 A. No.</p> <p>2 Q. Okay. And if he didn't get into an argument</p> <p>3 with Sheri Dore, isn't it possible that, whatever mood</p> <p>4 he was in, he could have just gotten into an argument in</p> <p>5 another part of the city?</p> <p>6 A. Sure.</p> <p>7 Q. So in other words, there wasn't necessarily any</p> <p>8 more officer time used because of the Food Not Bombs</p> <p>9 event because, whatever those people were doing at Food</p> <p>10 Not Bombs which caused the police to be there, they</p> <p>11 could have just been elsewhere causing the same problem,</p> <p>12 and the police would have been going to wherever they</p> <p>13 were causing those problems, correct?</p> <p>14 MR. SOH: Objection; form.</p> <p>15 A. So, yes, crime could be committed anywhere in</p> <p>16 the city. But if we know that there are certain</p> <p>17 locations where we're having consistent complaints and</p> <p>18 consistent issues, then that's generally part of our</p> <p>19 policy. That's where we're going to allocate resources</p> <p>20 and try to address those quality of life issues, not</p> <p>21 where they could other possibly be committing those</p> <p>22 issues but where those crimes are actually being</p> <p>23 committed.</p> <p>24 Q. (BY MR. KALLINEN) But isn't it true, when</p> <p>25 people gather, you know, anywhere, there could be</p>
<p style="text-align: right;">Page 175</p> <p>1 A. Sure.</p> <p>2 Q. (BY MR. KALLINEN) So if these people did not</p> <p>3 litter at Food Not Bombs on occasion, they could be</p> <p>4 littering in other parts of the city at the same time as</p> <p>5 they were not at Food Not Bombs, correct?</p> <p>6 A. They could. Sure.</p> <p>7 Q. So Food Not Bombs is not -- is not causing</p> <p>8 anybody to litter more than they would normally litter,</p> <p>9 correct?</p> <p>10 A. I wouldn't agree with that statement. I don't</p> <p>11 really...</p> <p>12 Q. Well, if they didn't get food at Food Not</p> <p>13 Bombs, isn't it true they could get food at a convenient</p> <p>14 store or somebody could hand them some food at another</p> <p>15 place and they could litter there too?</p> <p>16 A. If you're asking if a person can litter</p> <p>17 anywhere, then, yes, a person can litter anywhere.</p> <p>18 Q. Okay. It's all about getting into arguments.</p> <p>19 If a person was not at a Food Not Bombs event, isn't it</p> <p>20 possible they could just be at another part of the city</p> <p>21 and get into an argument?</p> <p>22 A. Yes.</p> <p>23 Q. Now, was the person who you mentioned had</p> <p>24 gotten in some argument with Sheri Dore, was he high or</p> <p>25 something? Did you suspect that?</p>	<p style="text-align: right;">Page 177</p> <p>1 issues?</p> <p>2 A. Yes, sir.</p> <p>3 Q. So what is special, though, about Food Not</p> <p>4 Bombs where that causes -- that you believe causes some</p> <p>5 more -- more police work than if these people were just</p> <p>6 spread out elsewhere in the city?</p> <p>7 A. I wouldn't say that there's anything about Food</p> <p>8 Not Bombs that creates that. Our issue is that,</p> <p>9 whenever there are large concentrations of individuals</p> <p>10 who in the past and we've had frequent complaints from,</p> <p>11 you know, then we're going to allocate our resources to</p> <p>12 that area.</p> <p>13 Q. Now, wouldn't that be true like at a Texans</p> <p>14 game, for example, there's a lot of people; so you</p> <p>15 should go out there because there's a lot of people</p> <p>16 there and there could be more problems because there's a</p> <p>17 lot of people?</p> <p>18 A. We have plenty of police officers that work</p> <p>19 Texans games, sir.</p> <p>20 Q. Yes, exactly. If a child is at a birthday</p> <p>21 party outside the City of Houston and they're hungry,</p> <p>22 are they in need?</p> <p>23 MR. SOH: Objection; form.</p> <p>24 Go ahead and answer, Captain.</p> <p>25 A. In need of what?</p>